

EXHIBIT C

Declaration of Dr. Claire Smrekar

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

DIANE COWAN *et al.*

Plaintiff,

and

UNITED STATES OF AMERICA.

Plaintiff-Intervenor,

v.

BOLIVAR COUNTY BOARD OF
EDUCATION *et al.*,

Defendants.

Civil Action No. 2:65-CV-00031-DMB

DECLARATION OF DR. CLAIRE SMREKAR

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that:

1. My name is Dr. Claire Smrekar. I am currently an Associate Professor of Public Policy and Education at Vanderbilt University.
2. I have been retained by the United States Department of Justice, Civil Rights Division, Educational Opportunities Section as a consultant and expert witness in the above-captioned case since July 3, 2014.
3. I assisted the Department of Justice in developing the United States' Proposed Desegregation Plan for the Cleveland School District (Dkt. #109) ("United States' Plan"), submitted to the Court on January 23, 2015, and am familiar with that plan and its implementation requirements.

4. I prepared an expert report in this case, dated March 20, 2015, which provides a detailed analysis of the Cleveland School District's (the "District") Proposed Plans (Plan A & Plan B) (Dkt. #108) and the United States' Plan.
5. I provided expert testimony on the parties' proposed plans during the evidentiary hearing held from May 18, 2015, to May 22, 2015. My expert report is identified in the record as Plaintiff-Intervenor's Exhibit 1.
6. My professional judgment and informed opinion in this case are based on more than 25 years of professional experience and scholarly research.
7. The Department of Justice has asked me to prepare this declaration to respond to the Court's May 13, 2016, Opinion and Order, directing parties to set forth a timeline for the implementation of the United States' Plan.
8. It is my opinion that the District has sufficient time between now and the beginning of the 2017-2018 school year to undertake the action items actions described in the United States' Plan, including engaging in academic program planning, addressing staffing needs, undertaking public engagement and marketing in support of the new schools, and convening a multiracial advisory panel to advise the District on various aspects of the implementation of the plan. These "planning year" activities can all reasonably occur between June 2016 and August 2017.
9. The Department of Justice has also asked me to explore whether the District could take any interim measures in time for the 2016-2017 school year that would lessen the harm from segregation that students suffer under the current system.

10. I identified that the District may be able to create separate District-wide sixth grade and ninth grade academies for the upcoming 2016-2017 school year as one such interim measure that could be implemented along the path to full consolidation.
11. This interim measure, if adopted, would have the practical effect of ensuring that no new students enter the current dual segregated system of secondary schools.
12. Generally, the sixth and ninth grade academy model is designed to create a small learning community to facilitate a smooth, secure and academically successful transition for students moving from elementary to middle school, and for students advancing from middle to high school. Sixth and ninth grade academies aim to consistently and comprehensively promote a socially and academically supportive school environment for all students during this transition year. Sixth and ninth grade academies may be co-located within a larger middle school and/or high school campus, or alternatively, may be sited at a different location that is physically separate, distinct, and apart from the location of the upper grades at each school.
13. Research suggests that sixth and ninth grade academies foster a more personalized learning community that enhances students' academic opportunities, while creating a socially distinct community of students, faculty and staff. Teachers develop strong and collegial relationships within an academy structure focused specifically on the particular social and academic needs and interests of the sixth and ninth grade students.
14. The sixth and ninth grade academy model requires a caring, dedicated faculty with a focus on students' learning, healthy development, and social and academic well-being. In some academies, teachers and staff serve as mentors for sixth and ninth grade "transitioning" students.

15. Sixth and ninth grade academies do not require the development of specialized curricular options sometimes found in grades 10-12.
16. Students enrolled in sixth and ninth grade academies enjoy full access to school-wide extra-curricular program options. Transportation may be provided if athletic and other non-academic related organizations and facilities are housed in a different location other than the academy.
17. Assuming the District could prepare facilities for this use, in my opinion the academy model could be implemented immediately for the upcoming 2016-2017 school year.

Executed this 3 day of June 2016.


DR. CLAIRE SMREKAR
